

## REMARKS

Newly cited rejecting references were applied in the above-identified Office Action against the claims of this application. In particular, the claims have now been rejected as being obvious in view of a hypothetical combination of the Hwang and Kinoshita patents. It is respectfully submitted, however, that such a consideration of the prior art should not be deemed to render obvious any of Claims 1-15 of this application.

First, it is noted that the claimed invention is directed to a pickup device wherein a transfer switch (e.g. element 2 in Fig. 2) included in a pixel transfers photoelectric conversion charges generated by a photoelectric conversion unit (e.g., element 1) to a charge accumulation unit (e.g. FD).

With regard to the cited prior art, it is acknowledged in the Office Action that the Hwang patent fails to disclose the application of a plurality of transfer pulses to a transfer switch. That deficiency of Hwang as a rejecting reference is said in the Office Action to be overcome by the disclosure of the Kinoshita patent on the grounds that Kinoshita discloses applying a plurality of transfer pulses to a transfer switch, and that a combination of those two references would render obvious Applicants' claimed invention. Applicants submit, however, that such a combination of references is not suggested except by hindsight; and, that even if made the combination would not result in a disclosure of the invention of Claims 1-15.

### There is No Suggestion In The Prior Art To Combine The Cited References

Applicants stress first that the sensors of Hwang and Kinoshita are quite different, as are the methods of reading the outputs of such sensors. As a result, it is submitted that it would not be possible to combine those sensors, and that it would be

unobvious to combine the disclosures of those patents except as a result of hindsight after reading Claims 1-15.

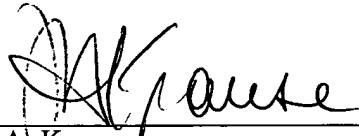
The Pulses In Kinoshita Are For A Different Purpose Than Those Of Claims 1-15

Applicants stress also that while the Kinoshita reference discloses that pulses are applied to the transfer electrode for performing transfer operations, those pulses are applied because of the CCD type image pickup of Kinoshita. That is, as described at Col. 6, lines 17-34 of the Kinoshita patent, in the case of the pixel arrangement of the CCD structure of that patent, wherein a part of the transfer channel is made narrower, transfer efficiency would be degraded and a high-speed transfer would not be attained. Accordingly, the transfer operations are performed in Kinoshita for a different purpose than in Applicants' claimed invention.

For these various reasons, it is believed that all of Claims 1-15 are allowable, and a formal Notice of Allowance is solicited.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



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